

DECLARATION OF Sam Jones

CIVIL ACTION NO.:  
3:22-cv-00052

United States Court's  
Southern District of Texas  
FILED

APR 11 2022

JULIO A. Zuniga

v.

PATRICK O'DANIELS

Nathan Ochsner, Clerk of Court

Sam Jones hereby declares: I have been incarcerated at "TOC" since November of 2014. Since July 2018 I have been on Darrington/Memorial Unit, and served time with Saul Chavez / on multiple areas of Memorial Unit.

ON 4/4/22. I WITNESSED OFFICER AHOOVEY - (SHAKEDOWN TEAM) HARASS AND DISCRIMINATE ON FELLOW WORKER - CHAVEZ BY INTIMIDATION, PROVOCATION, AND PLACING HANDCUFFS ON HIM FOR NO REASON. I WAS WATCHING THE EVENT GO DOWN A FEW FEET AWAY IN FRONT OF MEDICAL ENTRY, ON CLAMERIA, BETWEEN 11:00 - 11:45.

THIS OFFICER Ahovey has singled out, Basil Azor, Javier Martinez, Saul Chavez, ALL IWOC-MEMBERS, - THE RACIAL DISCRIMINATION, has gotten VIOLENT, WITH CONSTANT HARRASSMENT BY AHOOVEY, TILLIANS DURBER, Williams, Major Cooper, AND THE INFAMOUS "REGINALD GILBERT"

I declare under penalty of perjury that the foregoing is TRUE AND CORRECT. Executed at Rosharon, TEXAS - MEMORIAL PLANTATION.

4/4/22

Sam Jones

Julio A. Zuniga

#1961551

59 DARRINGTON RD.  
Rosharon, Texas 77583

Respectfully Submitted,  
Honorable J. V. Brown

This is my Parole Attorney, *Mark Morales*  
Law Office of *Mark Morales & Associates, PC*

A Parole Attorney Who Cares - *Tired*.

Intentionally Handwritten  
824 S. Austin Ave. Georgetown, TX 78626 (512) 635-9835 markmorales.com

## TIRED OF DOING TIME? READY TO GO HOME?

Greetings,

The Texas Department of Criminal Justice online Offender Information Search indicates that you are an TDCJ inmate who is soon approaching eligibility for parole. I am an attorney of 18 years. But first and foremost, I am a follower of Jesus Christ. In fact, everyone on my team is also a believer. My friend and legal assistant, John Lane TDC #503730, is a former Texas inmate. While we do not, in any way discriminate or judge based on your beliefs, we do want you to understand that we consider our parole practice to be a ministry.

We pray every day for our clients, and on most days pray with our clients. And while other parole firms may refrain from taking difficult cases because of the circumstances of the offense or criminal history; we primarily look at the heart of the person and their desire to change, regardless of their past. The Parole Board needs to see change but our first goal is for them to see you through a lens of compassion and mercy, instead of judgement. It is our hope and prayer that the lead voter be given the grace to see you the way God sees you.

No attorney can guarantee you results, but we will join with you as we pray and work hard for your freedom. Hiring the right attorney, means you will have a voice that can speak up for you and present your case in best light. Upon retaining my services I will mail you a packet containing a questionnaire, instructions and a checklist of all the necessary items I would like you and your designated friends/family to send me over the next few months. If you are within my visitation area, I will come to see you at the unit, and if not, then I will set up a phone line with your unit and visit with you over the phone. I will use the information you provide along with information I gather in our meeting to prepare a parole packet for you. At the appropriate time, I schedule your hearing and personally speak to the lead voter and present your case. You can be assured that you will have a zealous advocate in your corner!

I was nominated by my peers then selected by *Thompson Reuters* and featured in *Texas Monthly* magazine as a **CRIMINAL DEFENSE SUPER LAWYER & earlier in my career a SUPER LAWYER, RISING STAR**. According to Thompson Reuters data, less than 5% of all attorneys will ever receive this recognition and I am humbled to be in that category. I have spent the last 15 years, the majority of my career, defending clients accused of crimes. Prior to that I worked as an Assistant District Attorney. Now I am reaching out to help secure your freedom on parole.

If I am able to accept your case, I will do everything possible to make the strongest case to secure your freedom through release on parole. You can reach me at the contact information above.

MARK MORALES, ATTORNEY AT LAW

REFERRED By:  
Julio A. Zuniga

ADVERTISEMENT

TEXAS DEPARTMENT OF CRIMINAL JUSTICE  
CORRESPONDENCE / CONTRABAND DENIAL FORM

H205

NAME

UNIT

CORRESPONDENCE:  TO OR  FROM

*Juli Zuniga 196153*

Heather Austin ABC  
c/o Monkeywrench Books  
11047 Loop Blvd E. Austin, TX 78751

TDCJ-CID#

DATE CORRESPONDENCE RECEIVED 10.14.20

DATE OFFENDER NOTIFIED

HOUSING

1 <sup>st</sup> Attempt	/	/
2 <sup>nd</sup> Attempt	/	/
3 <sup>rd</sup> Attempt:	/	/

The above correspondence has been denied to you in accordance with BP-03.91, Uniform Offender Correspondence Rules.

DENIED:

*3 copies of 1040 Tax Form*

RECEIVED:

*envelope with letter*

**APPEAL:** Should persons outside the institution desire to appeal, submit a written appeal to the Director's Review Committee, PO Box 99, Huntsville, TX 77342-0099. The appeal must reach the DRC WITHIN TWO (2) WEEKS of the notification date listed above.

Does offender wish to appeal the decision?  Yes  NoDRC Non-Appealable List:   
(Offender cannot appeal)

DISPOSITION IS ALLOWED AND MUST BE CHECKED AT THE TIME OF DENIAL, UNLESS SECURITY CONCERNS MANDATE OFFENDER NOT BE GIVEN A CHOICE OF DISPOSITION (BOARD POLICY 03.91):

 No Disposition Allowed Destroy Send to the following person at the offender's expense: \_\_\_\_\_

Name &amp; Address

IF DISPOSITION IS NOT EXECUTED OR LITIGATION/GRIEVANCE PROCESS HAS NOT BEGUN WITHIN SIXTY (60) DAYS OF THE INITIAL DENIAL OR FROM THE DRC DECISION DATE (IF APPEALED), THE ITEM(S) WILL BE DESTROYED.

*Anderson* Employee Signature

Date 10/21/20

Offender Signature

Date 10/21/20

UNIT DISPOSITION: MAILED DESTROYED FILED 

Date

Employee Signature

 DRC APPROVED, RETURNED TO OFFENDER

Offender Signature

Date

DISTRIBUTION:  
Original - Send to the DRC IF THE OFFENDER WISHES TO APPEAL. If not, keep on unit.  
Yellow - Offender Copy

I-153 (Rev. 09/18)

## TDCJ DISCIPLINARY REPORT AND HEARING RECORD

CASE: 20220126462 TDCJNO: 02331771 NAME: BONILLA, ERIC JAMES EA: 11.9  
 UNIT: DA HSGN: 3-TANK 005B JOB: INSIDE MEDICAL SQ 04 IQ: 092  
 CLSS: 2A CUST: GE PRIMARY LANGUAGE: ENGLISH LMHA RESTRICTIONS: NONE  
 GRDE: MI / WR OFF DATE: 03/23/22 02:50 PM LOCATION: DA WINDHAM CLASSROOM  
 TYPE: ID

## OFFENSE DESCRIPTION

ON THE DATE AND TIME LISTED ABOVE, AND AT DA UPSTAIRS EDUCATION, INMATE: BONILLA, ERIC JAMES, TDCJ-ID NO. 02331771, REFUSED TO ATTEND THE ACADEMIC PROGRAM IN WHICH HE IS ENROLLED, NAMELY, COGNITIVE INTERVENTION 2, WITHOUT A LEGITIMATE REASON SUCH AS ILLNESS.

CHARGING OFFICER: HAFFORD, T. COV

SHIFT/CARD: 1 H

## INMATE NOTIFICATION

TIME/DATE NOTIFIED: 11-29-04/05/22 BY: (PRINT) Salako IF APPLICABLE INTERPRETER:  
 YOU WILL APPEAR BEFORE HEARING OFFICER 24 HOURS OR MORE AFTER RECEIPT OF THIS NOTICE. YOU HAVE THE RIGHT TO SUBMIT A WRITTEN STATEMENT AND MAKE A VERBAL STATEMENT. DO YOU WANT TO ATTEND THE HEARING? YES NO IF NO, HOW DO YOU PLEAD? GUILTY NOT GUILTY

INMATE NOTIFICATION SIGNATURE: G. Q. Lee DATE: 4-5-22  
 BY SIGNING BELOW, YOU GIVE UP YOUR RIGHT TO 24-HOUR NOTICE AND AUTHORIZE THE HEARING OFFICER TO PROCEED WITH THE HEARING.

INMATE WAIVER SIGNATURE: G. Q. Lee DATE: 4-5-22

## HEARING INFORMATION

HEARING DATE: \_\_\_\_\_ TIME: \_\_\_\_\_ INTERPRETER SIGNATURE: \_\_\_\_\_  
 EXPLAIN BELOW IF HEARING WAS NOT HELD WITHIN SEVEN DAYS, EXCLUDING WEEKENDS AND HOLIDAYS, FROM THE OFFENSE DATE: \_\_\_\_\_

INMATE STATEMENT: I had a late-in-for 1:30 lab work and cleaning  
 (no to see the doctor.)

## OFFENSE CODES:

INMATE PLEA: (G. NG. NONE) NG FINDINGS: (G. NG. DS) G PUNISHMENT

## LOSS OF PRIV (DAYS)

REPRIMAND

\*RECREATION (DAYS) 26 days

EXTRA DUTY (HOURS) \_\_\_\_\_

\*COMMISSARY (DAYS) 20 days

CONT.VISIT SUSP THRU \_\_\_\_/\_\_\_\_/\_\_\_\_

\*PROPERTY (DAYS) \_\_\_\_\_

CELL RESTR (DAYS) \_\_\_\_\_

\* (DAYS) \_\_\_\_\_

INMATE SIGNATURE FOR RECEIPT OF FINAL REPORT: G. Q. Lee

HEARING OFFICER (PRINT)

WARDEN

31903

## TDCJ DISCIPLINARY REPORT AND HEARING RECORD

CASE #A2300098583 TDCJNG:02331771 NAME: BONILLA, ERIC JAMES  
 UNIT: 6A HNG: 5-TANK 205B JOB: UNOPEN PENDING ASSIGNMENT TO: 052  
 CLASS: 62 CUST: 61 PRIMARY LANGUAGE: ENGLISH LMHA RESTRICTIONS: NONE  
 GROU: 115 WK OFF. DATE: 02/09/22 02:50 PM LOCATION: DA WINDHAM CLASSROOM  
 TYPE: 1

## OFFENSE DESCRIPTION

ON THE DATE AND TIME LISTED ABOVE, AND AT THE UPSTAIRS EDUCATION, INMATE, BONILLA, ERIC JAMES, TDCJ-ID NO. 02331771, REFUSED TO ATTEND THE ACADEMIC PROGRAM IN WHICH HE IS ENROLLED, NAMELY, COGNITIVE INTERVENTION 2, WITHOUT A LEGITIMATE REASON SUCH AS ILLNESS.

CHARGING OFFICER: CHAFFORD, COV SHIFT/CARD #1H  
 INMATE NOTIFICATION IF APPROPRIATE INTERPRETER,  
 DATE/DATE NOTIFIED: 2/10/22 BY (PRINT) (P.R.C.)  
 YOU WILL APPEAR BEFORE HEARING OFFICER 24 HOURS OR MORE AFTER RECEIPT OF THIS NOTICE. DO YOU WANT TO ATTEND THE HEARING? YES NO IF NO, HOW DO YOU PLEAD? GUILTY NOT GUILTY

INMATE NOTIFICATION SIGNATURE: *Eric* DATE: 2/10/22  
 BY SIGNING BELOW, YOU GIVE UP YOUR RIGHT TO 24 HOUR NOTICE AND AUTHORIZE THE HEARING OFFICER TO PROCEED WITH THE HEARING.

INMATE WAIVER SIGNATURE: *Eric* DATE: 2/10/22

## HEARING INFORMATION

HEARING DATE: 2/16/22 TIME: 12:00 PM UNIT: FOLDER A FILE #5 DSFILE: 201634  
 COUNSEL SUBSTITUTE AT HEARING: FOLDER FILE DSFILE  
 EXPLAIN BELOW BY NUMBER: (1) IF COUNSEL SUBSTITUTE WAS NOT PRESENT DURING PART HEARING, (2) IF ACCUSED INMATE WAS CONFINED IN PRE-HEARING DETENTION MORE THAN 72 HOURS PRIOR TO HEARING, (3) IF ACCUSED WAS EXCLUDED FROM ANY PART OF THE EVIDENCE STAGE, (4) IF ANY WITNESSES OR DOCUMENTATION WAS EXCLUDED FROM HEARING (5) IF DEFENDER WAS DENIED CONFRONTATION AND/OR CROSS-EXAMINATION OF A WITNESS AT THE HEARING (6) IF HEARING WAS NOT HELD WITHIN SEVEN DAYS, EXCLUDING WEEKENDS AND HOLIDAYS, FROM THE OFFENSE DATE AND, (8) IF INTERPRETER USED:  
 (SIGNATURE)

## INMATE STATEMENT

## OFFENSE CODES:

INMATE PLEA: (G, NG, NONE) *NG*

FINDINGS: (G, NG, DS)

REduced TO MINOR (PRIOR TO DOCKET) (DOCKET) (HEARING) BY: (INITIAL)  
 IF GUILTY, EVIDENCE PRESENTED, CONSIDERED, AND REASON(S) FOR DETERMINATION OF GUILTY  
 A) ADMISSION OF GUILT, B) OFFICER'S REPORT, C) WITNESS TESTIMONY, D) OTHER.  
 EXPLAIN IN DETAIL:

## PUNISHMENT

## LOSS OF PRIV(DAYS)

REBREMAND, P. 2000

REMAIN LINE 3

\*RECREATION(DAYS) EXTRA DUTY(HOURS)

REDUC. CLASS FROM TO

\*DISCIPLINARY(LAYS) CONT. VISIT SUSP. THRU / /

GOOD TIME LOST(DAYS)

\*PROPERTY(DAYS) CELL RESTR(DAYS)

DAMAGES/FORFEITT. \$

\* OTS(DAYS) SPECIAL CELL RESTR(DAYS)

SPECIFIC FACTUAL REASON(S) FOR PARTICULAR PUNISHMENT IMPOSED:

CREDIT FOR PRE-HEARING DETENTION TIME YES(DAYS) NO / NO

DATE PLACED IN PRE-HEARING DETENTION: 2/10/22 HEARING LENGTH (MINUTES)

INMATE SIGNATURE FOR RECEIPT OF FINAL REPORT *Eric* 2/10/22

HEARING OFFICER (PRINT) WARDEN REVIEWER SIGNATURE

(FORM T-470) CONTACT COUNSEL SUBSTITUTE IF YOU DO NOT UNDERSTAND THIS FORM.

(REV. 04-10) COMUNIQUESE CON SU CONSEJERO SUSTITUTO SI NO ENTIENDE ESTA FORMA